

PARK COUNTY COMMISSIONERS
414 East Callender Street, Livingston, MT 59047 Phone (406) 222-4118

Received

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DSC-RP

November 20, 1999

Clifford Hawkes, Job Captain
Planning and Design Services
Denver Service Center
National Park Service
12795 W. Alameda Parkway
Lakewood, CO 80228

Dear Mr. Hawkes:

Park County would like to comment further on the draft EIS and also on refute for the record, remarks that were made at the public hearing in Livingston on Saturday, October 23, 1999. Some of the remarks made about our survey were untrue and others showed a lack of understanding of American representative government.

The Park County Commissioners are the duly elected representatives of all the residents of Park County. While individuals may not agree on some issues and are entitled to state their disagreements, to say that the Commissioners do not represent them shows a disregard for the elective process.

The survey was designed for businesses in the gateway communities, i.e. Gardiner and Cooke City. Therefore, Ms. Sourvigny would not have received one, because her business is located in Livingston. We did not include any Livingston businesses because we were mainly trying to determine what the effect, if any, there would be on the gateway communities.

We also take exception to the comment by Ms. Page that the survey was biased, with no explicit examples of any bias. The survey asked several straightforward questions about impacts, if any, on businesses if snowmobiles were banned in Park County. The reason for the no snowmachine scenario was that we did not receive the draft alternatives from NPS in time to include them in our first survey. When they were received, the survey was again distributed including the alternatives, but given the time frame, response was very poor. We have had the survey analyzed and that analysis is attached for your information.

NPS's process has been flawed from the start. The counties named as cooperating agencies have met every deadline and participated in every workshop and meeting that was held by NPS.

In addition cooperating counties have worked diligently and in good faith to try to meet our obligations. We have been met by resistance on the part of NPS at every turn.

NPS has not met several deadlines that were crucial to our providing them with our socio-economic data. The critical deadline was the alternatives were to be provided us by January 1, 1999 and we would have until March 1, 1999 to analyze them. We received the drafts on April 22, 1999 and the analysis had to be completed by May 24, 1999.

The October 19, 1999 press release stating that the air quality at the Yellowstone's West Gate in West Yellowstone, Montana, is worse than Azusa, California's was not true, and to this point there has been no formal retraction by NPS of that report. It is another example of the spin used by NPS. Sixty second sound bytes rather than facts seem to be the order of the day with Yellowstone Park officials.

Yellowstone Park Officials have violated the Memorandum of Agreement they signed with Park County on November 9, 1998. The MOA states that the lead agency shall "request input and permit adequate time for the response from the cooperating agencies, provide in a timely manner and allow the appropriate cooperating agencies to review analysis relevant to the information provided by that cooperating agency. Share and exchange models, data and other information in their possession now or when developed relating to affected resources and environmental impacts and mitigation relating to the proposed actions and its alternatives in the EIS." All of the above agreements have been violated by NPS. They did not provide the cooperating agencies with adequate time to review alternatives, and they did not share models, data or any other information including the report released on October 19, 1999.

We request that the National Park Service make a concentrated effort to reestablish integrity to the process. NPS should schedule a meeting with all cooperating agencies to resolve issues and repair the damage they have done to the process. NPS should also provide all cooperating agencies with all pertinent information as they agreed in the MOA.

Sincerely,
Park County Commissioners

Dan B. Gutehjer, Chair

Jim Hunt, Commissioner

Terry Sarrazin, Commissioner

Park County Yellowstone National Park Winter Use Impact Survey 1999
Number of Surveys Returned: 22

1. What type of business do you operate in the Winter Season?

Responses:

- 1 Storage Unit
- 4 Bed & Breakfast/Cabins
- 1 Retail Store
- 2 Snowmobile Sales & Service
- 7 Hotel/Motel/Lodging
- 1 Propane Sales
- 1 Restaurant
- 2 Unknown
- 1 Pawn Shop
- 1 Bar/Saloon

14. If Yellowstone National Park prohibited snowmobiles, how would it affect your business?

Responses:

- 4 No Effect (2 Hotel/Motel; 1 B&B; 1 Restaurant)
- 1 Layoff employees (Snowmobile Sales/Service)
- 7 Close business in Winter (2 B&B; 1 each Storage Unit, Hotel/Motel, Retail Store, 2 Unknown)
- 0 Seek alternative sources of revenue
- 0 Reduce non-payroll expenses
- 2 Other (B&B, Hotel/Motel: Advertise more in Paradise Valley)

15. If Yellowstone National Park prohibited snowmobiles, how would it affect your business?

Responses:

- 3 No Effect (Hotel/Motel; Restaurant; Snowmobile S&S)
- 1 Layoff employees (Snowmobile S&S)
- 3 Close business in Winter (Retail Store; B&B; Unknown)
- 0 Seek alternative sources of revenue
- 1 Reduce non-payroll expenses (Hotel/Motel)
- 1 Other (B&B: Advertise more in Paradise Valley)

YNP WINTER USE ECONOMIC IMPACT SURVEY PARK COUNTY, MT

TOTAL NUMBER OF SURVEYS RETURNED 22

1. LIST ATTACHED	TYPE OF BUSINESS
2. 169	NUMBER OF PEOPLE YOU EMPLOY DURING THE WINTER SEASON
3. \$2,393,500.00	TOTAL GROSS ANNUAL SALES TO YNP WINTER VISITORS
4. 49.88%	% OF WINTER SALES TO YNP WINTER VISITORS
5. 36.18%	% OF TOTAL SALES TO YNP WINTER VISITORS
6. 14.03%	% OF YNP WINTER VISITOR SALES THAT ARE TO PARK COUNTY RESIDENTS
7. 46.18%	% OF WINTER SEASON CUSTOMERS THAT ARE YNP WINTER VISITORS
8. 34.59%	% OF YOUR TOTAL CUSTOMER BASE THAT ARE YNP WINTER VISITORS
9. 34.50%	% OF YNP CUSTOMERS THAT ARE PARK COUNTY RESIDENTS
10. 10,671	NUMBER OF CUSTOMERS THAT ARE YNP WINTER VISITORS
10A. 762	AVERAGE NUMBER OF CUSTOMERS YNP WINTER VISITORS
11. 11597	TOTAL NUMBER OF CUSTOMERS LOST IF YNP WINTER VISITS PROHIBITED
11A. 677	AVERAGE NUMBER OF CUSTOMERS LOST
12. \$436,030.00	LOST SALES IF YNP WINTER VISITS WERE PROHIBITED
12A. \$24,223.89	AVERAGE LOST SALES
13. \$340,850.00	TOTAL WINTER SEASON PAYROLL
13A. \$20,050.00	AVERAGE WINTER SEASON PAYROLL
16. 25.50	HOW MANY LAYOFFS?
16A. 1.16	AVERAGE NUMBER OF LAYOFFS
17. \$84,700.00	REDUCTION IN PAYROLL DUE TO WINTER LAY OFFS.
17A. \$6,515.38	AVERAGE REDUCTION IN PAYROLL

PARK COUNTY, MONTANA *(See also responses to Paul Kruse, Representative of Cooperating Counties)*

Cover letter. Re: Flawed NPS process. There is a desire on the part of NPS to cooperate. The effectiveness of the process used in this EIS relative to cooperating agencies is subject to debate, especially given the short time frames. Early on, NPS intended to invite the three states surrounding the parks to participate as cooperating agencies in developing the EIS. NPS believed the states could provide information on impacts to natural resources and local and regional economies. Without consulting with NPS, CEQ opined to a Wyoming Senator that counties also should act as cooperating agencies in this process. Thus NPS was faced with working with seven cooperating agencies, several of which had never before participated in a NEPA process as cooperators. Due to the schedule set by the settlement agreement, NPS had little time to work with cooperating agencies on what was expected of them in that role. This includes disagreements about the nature of special expertise in the NEPA process, and the burden of the cooperator in providing it. As a result, the cooperators often acted as though the relationship was one where the NPS was to provide information to them, instead of the reverse. NPS regrets the way that this relationship has evolved, owing in large part to the short time frame for environmental analysis. NPS notes that Mr. Paul Kruse, designated representative for cooperating counties, states in his letter that the counties provided detailed socio-economic analysis and that NPS ignored the input. This is definitely not the case. It is clear that roles and expectations in the process were, and are, not well understood, despite the cooperating agreements that were negotiated and signed.

Attachment to cover letter, County survey. NPS acknowledges receipt of the survey and will refer to it as appropriate in the FEIS.